

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

HENRY UNSELD WASHINGTON,	}	No. 3:19-cv-00196-LPL
	}	
Plaintiff,	}	Magistrate Judge Lenihan
	}	
vs.	}	
	}	
DELISMA, et al.,	}	
	}	<b><i>Electronically Filed.</i></b>
Defendants.	}	

**CORRECTIONS DEFENDANTS’<sup>1</sup> MOTION FOR SUMMARY JUDGMENT**

AND NOW come the Corrections Defendants, by their Amanda M. Scarpo, Deputy Attorney General, and Scott A. Bradley, Senior Deputy Attorney General, and file the following Motion for Summary Judgment, averring as follows.

1. Plaintiff, an inmate currently incarcerated at SCI-Somerset.
2. Plaintiff filed a *pro se* Amended Complaint [ECF No. 43] on June 1, 2020. After the Court noted some irregularity with Plaintiff’s Amended Complaint, see Text Order [ECF No. 58], Plaintiff subsequently filed three separate Supplements to his Amended Complaint, see [ECF Nos. 60, 61, 62]. Collectively, those documents<sup>2</sup> have been referred to as Plaintiff’s “Amended Complaint.”
2. The Commonwealth Defendants now move for summary judgment.
3. There are no genuine issues as to any material facts with respect to the claims at issue in this case.

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<sup>1</sup> The remaining Corrections Defendants are: Defendants Hyde, Bowers, Snyder, and Tice.

<sup>2</sup> Totaling 56 pages, four-parts [ECF Nos. 43, 60, 61, 62], and 423-paragraphs.

4. Corrections Defendants herewith file a Brief in Support of this Motion, providing reasons in support of the foregoing assertion with greater particularity. The contents therein are incorporated by reference.

5. A Concise Statement of Undisputed Material Facts has also been filed, as has an Appendix identifying the attached exhibits.

WHEREFORE, Corrections Defendants respectfully request that this Court enter summary judgment in their favor and against Plaintiff on all claims.

Respectfully submitted,

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s/ *Amanda M. Scarpo*  
Amanda M. Scarpo  
Deputy Attorney General  
Attorney I.D. No. 318596

Scott A. Bradley  
Senior Deputy Attorney General

Date: October 20, 2021

**CERTIFICATE OF SERVICE**

I, Amanda M. Scarpo, Deputy Attorney General for the Commonwealth of Pennsylvania, hereby certify that on October 20, 2021, I caused to be served a true and correct copy of the foregoing document titled ***CORRECTIONS DEFENDANTS' MOTION FOR SUMMARY JUDGMENT*** to the Plaintiff via first class mail, postage prepaid to the following address:

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Date: October 20, 2021

By: /s/ *Amanda M. Scarpo*  
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